UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
V.)
) CRIMINAL NO. 14-10276-IT
JOHN WILLIAM CRANNEY, aka)
JACK CRANNEY)
Defendant)

DEFENDANT'S MOTION TO CONTINUE STATUS DATE

Now comes defendant, John W. Cranney, who respectfully moves this Court to continue the status date from September 8, 2017 to September 15, 2017 at 2:00 pm. In support of this request, defendant states the following:

- (1) Mr. Cranney has a catheterization scheduled at a Boston hospital on September 7, 2017. There is a significant chance that Mr. Cranney will remain inpatient for a few days given the effects that this invasive procedure will likely have on him given his age and physical condition. As discussed during the evidentiary hearing conducted on August 4, 2017, this procedure presents a significant health risk for Mr. Cranney and it is expected that the hospital will keep him inpatient to monitor him post-procedure.
- (2) It may also take a few days for his medical team to consult with Mr. Cranney about the viable options available to him and to choose the path of treatment. Consequently, it makes sense for the Court to continue his status hearing for a week so that we will have a better sense of Mr. Cranney's health situation.
 - (3) The government does not oppose this request to continue the hearing date.
 - (4) Both parties request a 2:00 pm call on September 15, 2017.

Respectfully Submitted,

2

/s/JAMES BUDREAU
James Budreau
BBO# 553391
Bassil, & Budreau
20 Park Plaza, Suite 1005
Boston, MA 02116
617-366-2200

CERTIFICATE OF SERVICE

I, James Budreau, do hereby certify that this motion has been served by hand upon AUSA Mark Balthazard and Kriss Basil on this 17th day of August 2017.

/s/ James Budreau James Budreau